

Although MidAmerica Jet is in favor of DRVSM, the complete implementation of the program by December 31, 2004 seems unrealistic for many corporate and on-demand charter operators that are currently using this airspace.

MidAmerica Jet operates 3 Mitsubishi Diamond Jets and 1 Lockheed JetStar II. The cost to upgrade the Lockheed JetStar has been quoted at \$217,000, with 3 weeks down time.

At this time, there is no certified RVSM upgrade for the Diamond Jets. It has been estimated that the cost will be between \$100,000 and \$200,000 for each Diamond Jet, if a program is ever available. This amount approaches 20% of the aircraft's actual value. It is very unlikely that a program will be developed for the Diamond Jets prior to the RVSM proposed implementation date.

We will be forced to fly the Diamond Jets below FL290. The Diamond is not certified to fly above FL410. FL 350 and FL 370 are the efficient altitudes for the Diamond Jets. If we are forced to do our flying at altitudes below FL 290 we increase fuel consumption by a minimum of 24%. To us this means an average 12 month increase of 200,000 gallons. At an average \$2.25 per gallon, the DRVSM will cost our operation \$450,000 annually until we can upgrade the Diamond Jet fleet.

We recognize the need for RVSM. However, the proposed implementation date appears too soon and should be delayed, and gradual implementation, such as was done for the North Atlantic airspace, should be considered.